

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WAYNE BALIGA, derivatively on behalf of
LINK MOTION INC. (F/K/A NQ MOBILE INC.)

Case No.: 1:18-cv-11642-VM-DCF

Plaintiff,

-against-

LINK MOTION INC. (F/K/A NQ MOBILE INC.),
VINCENT WENYONG SHI, JIA LIAN, XIAO YU,

Defendants,

-and-

LINK MOTION INC. (F/K/A NQ MOBILE INC.),

Nominal Defendant.

DECLARATION OF JAKE NACHMANI

I, Jake Nachmani, declare as follows:

1. I am a senior associate at the law firm Seiden Law Group, LLP, which is counsel of record for Plaintiff in the above captioned matter. I am admitted to practice before the courts of the State of New York.

2. I make this declaration in support of Plaintiff's Opposition to the Motion to Intervene by China AI Capital Limited ("China AI").

3. I make this declaration based on my own personal knowledge, and, if called upon to do so, could and would testify competently thereto.

4. Attached as Exhibits 1 through 6 are true and correct copies of the following documents:

Exhibit 1: A May 2, 2020 letter submitted to the Court by Link Motion Inc.'s temporary receiver, Robert Seiden.

- Exhibit 2: Link Motion Inc.'s Shareholder Registry, as of May 4, 2020.
- Exhibit 3: A copy of *Schultz v. Reynolds and Newport Ltd*, 1992-93 CILR 59.
- Exhibit 4: A copy of *Svanstrom v. Jonasson*, 1997 CILR 192.
- Exhibit 5: A copy of *Zabusky & Ors v Virgtel Ltd & Ors* [2012] QCA 107.
- Exhibit 6: A copy of Link Motion Inc.'s Deposit Agreement as of April 15, 2011.

I declare under penalty of perjury that the foregoing is, to the best of my knowledge and belief, true and correct.

Dated: May 4, 2020
New York, New York

SEIDEN LAW GROUP LLP

/s/ Jake Nachmani
Jake Nachmani
469 Seventh Avenue, Fifth Fl.
New York, NY 10018
jnachmani@seidenlegal.com
(212) 523-0686

Counsel for Plaintiff Baliga